

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

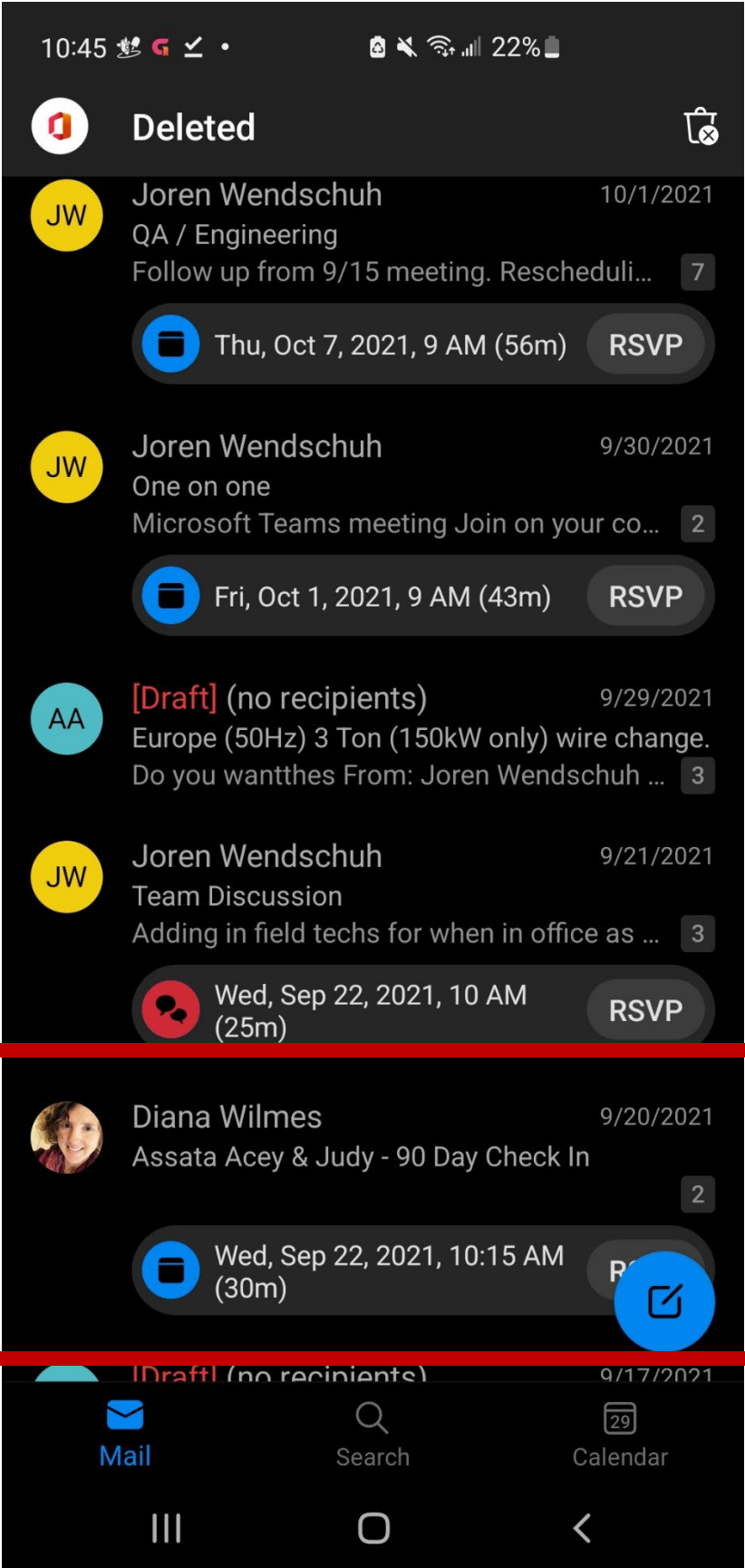
ASSATA ACEY,	:	CIVIL ACTION
	:	
<i>Plaintiff</i>	:	
v.	:	
	:	
	:	
INDUCTEV,	:	
	:	
<i>Defendant.</i>	:	
	:	
	:	
	:	No. 2:23-1438

Motion for Reconsideration of Concerning Documents 109 and 110

I, the Plaintiff, apologize for those defects in my motions to amend and for hearing, and request that the court reconsider its orders (Doc 109 and 110), with respect to the following additions to the record.

1. Relevance of withheld documents: Regarding Doc 110

- a) At least three of those documents withheld by the Defendant are relevant to the allegations of my complaint:
 - i) This is the record of the meeting in which I alleged to have complained to HR about sexual harassment (Complaint ¶¶24, 184):



(Ex 1)

- ii) This email is relevant to my disability claims against the defendant as a record of the effect of my illness as well as HR's awareness and response to said illness/symptoms. (Motion to Amend, ¶232a):
- Sent:** Friday, April 8, 2022 9:23:50 AM
To: MD Employees <MDEmployees@momentumdynamics.com>
Subject: Light Blue Accord car is running

Car up front is running and on, but no driver.

Judy Talis | Chief Administrative Officer
(p. 21 of Doc 97-1)

- iii) The third document (which was attached to my email to defendant on 05/17/2024, 1:19pm) , is relevant to my failure to promote claims regarding advanced tasks beyond my job scope-- as it documents my supervisor's post-complaint deletion of record of one of my projects (Compl ¶¶33-36):

From: [Joren Wendschuh \(Jira\)](#)
To: [Assata Acey](#)
Subject: [JIRA] (project) (GA2CE) Project moved to trash
Date: Monday, August 15, 2022 11:59:28 AM
Attachments: [jira-generated-image-static-footer-desktop-logo-531d1a6c-d2b4-4fb2-ad51-2fc3352db192](#)

EXTERNAL EMAIL

Joren Wendschuh moved this project to trash on 15/08/2022 15:59:20 .

The project, including all its issues, components, attachments, and versions will be available in the [trash](#) for 60 days after which it will be permanently deleted.

Only Jira admins can restore the project.

project

Get Jira notifications on your phone! Download the Jira Cloud app for [Android](#) or [iOS](#)

This message was sent by Atlassian Jira (v1001.0.0-SNAPSHOT#100204-sha1:948b370)



(Ex 2)

- b) Because the Defendant has chosen to evaluate **for themselves** which emails/documents are relevant to my claims, and allegedly have alleged that all unproduced documents were deemed irrelevant, there is no way of knowing what other important documents have been withheld.
- c) The entire email, **along with its attachments** and the defendant's response is provided as an attachment to this document.

2. Reason for Delay: Regarding Doc 109

- a) My motion to amend was delayed because I mistook the court's lack of deadline as an allowance to submit when ready and was focused on finding a (self-deemed motion-critical) piece of evidence that the defendant withheld from me.
- i) The court retains and has used its ability in this case to dismiss some of my motions and claims with prejudice, to that end, I did not deign to submit any amendment to my disability claims unless I could approach the defect from the three angles (regard as having disability, record of having disability, having disability).
 - ii) I was also aware of such an email existing and had been combing through thousands of files provided by the defendant in search of an "official" copy.
 - iii) It is only when I re-typed various portions of the message I could recall into my search engine that I was able to find the email and yet, I still attempted to ask the defendant if they had provided it.
 - iv) I understand now that I may have been expected to submit whatever I could find at the two-month mark but having had no deadline and attempting to meet all other deadlines I failed to do so.

3. Prejudice to opposing counsel: Regarding Doc 109

- a) The defendant's depositions of me included discussion of my disability claims as well as presentation of the Defendants counter arguments. I believe they are in possession of either the transcript or the video of same and should be able to file them or provide them to you for keyword search or review.
- b) Furthermore, the defendant need not rely on discovery to satisfy their need for medical records: Their subpoenas request ALL medical records possessed by those medical providers and they compelled a complete HIPPA release form for any record held by any health professional I had seen since 2017. (also attached)
- c) At this time, I am not aware of any additional discovery the defendants would seek to uncover those claims further.

Thank you for your time,

/s/ Assata Acey Hackman

Assata Acey Hackman(Pro Se)

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Date: 06/13/2024